

Michael Faillace & Associates, P.C.

Employment and Litigation Attorneys

60 East 42nd Street, Suite 4510
New York, New York 10165

Telephone: (212) 317-1200
Facsimile: (212) 317-1620

August 31, 2020

BY ECF

Hon. Lewis J. Liman
United States District Judge
United States District Court
500 Pearl Street
New York, NY 10007

Re: De Jesus Morales et al v. Stalwart Group Inc. et al

1:20-cv-03950-LJL

Dear Judge Liman:

We represent Plaintiff in the above referenced matter. We write to respectfully request an extension of time to serve the individual Defendant Samson Severs pursuant to FRCP 4(m) and to request adjournment of the initial conference scheduled for September 3, 2020. The reason for this request is that Plaintiff has been unable to serve individual Defendant thus far because his home address is currently unknown to Plaintiff and his place of business has been closed during the current COVID19 pandemic. Service upon the corporate Defendant has been made upon the Secretary of State, as authorized agent of Defendant.

We thank the Court for its attention to this matter.


The initial pretrial conference is ADJOURNED to
November 2, 2020 at 10:00 a.m.

Plaintiff is directed to file a motion seeking an extension of
the deadline to serve pursuant to Fed. R. Civ. P. 4(m).

SO ORDERED. 9/1/2020.

Respectfully Submitted,

/s/ Michael Faillace
Michael Faillace


LEWIS J. LIMAN
United States District Judge

Certified as a minority-owned business in the State of New York